

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

)
) MDL No. 2262
) Master File No. 1:11-md-02262-NRB
) ECF Case
)

THIS DOCUMENT RELATES TO:
Case No. 12-CV-1025 (NRB)

**BONDHOLDER PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL
APPROVAL OF SETTLEMENTS WITH BARCLAYS BANK PLC, UBS AG, HSBC
BANK PLC, CITIBANK, N.A., CITIGROUP INC., JPMORGAN CHASE & CO.,
JPMORGAN CHASE BANK, N.A., BANK OF AMERICA CORPORATION, BANK OF
AMERICA, N.A., AND THE ROYAL BANK OF SCOTLAND GROUP PLC**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, at 11:00 a.m. on December 16, 2020, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald or by such other means as the Court may designate, Plaintiffs Ellen Gelboim and Linda Zacher ("Bondholder Plaintiffs") will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for: (i) final approval of the Settlements with Barclays Bank plc, UBS AG, HSBC Bank plc, Citibank, N.A., Citigroup Inc., JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., Bank of America Corporation, Bank of America, N.A. and the Royal Bank of Scotland Group plc in the above-captioned action; (ii) confirmation in the Final Judgment and Order of the certification of the Settlement Classes; (iii) final approval of the Plan of Allocation; (iv) confirmation in the Final Judgment and Order of the appointment of Morris and Morris LLC Counselors At Law and Weinstein Kitchenoff & Asher LLC as Counsel

for the Settlement Classes; and (v) approval of the implementation of class notice, and for such other further relief as the Court deems appropriate.

Submitted herewith in support of Bondholder Plaintiffs' motion are: (i) a memorandum of law in support of the motion; (ii) the joint declaration of Karen L. Morris and Robert S. Kitchenoff in support of the motion; (iii) the declaration of Cameron R. Azari of Epiq Class Action & Claims Solutions, Inc., the Claims Administrator for the Settlements; and (iv) Bondholder Plaintiffs' proposed form of order granting the relief sought in this motion.

November 2, 2020

/s/ Karen L. Morris

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/s/ Robert S. Kitchenoff

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